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## OSBORN LAW P.C.

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January 9, 2023

### VIA ECF

Honorable Andrew L. Carter Jr.  
United States Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
49 Foley Square  
New York, NY 10007

Re: *Zapata v. Commissioner of Social Security*,  
Civil Action 1:22-cv-05544-ALC

Dear Judge Carter,

We write on behalf of plaintiff, Juana Lidia Zapata, and with the consent of the defendant, to request a 10-day extension of time to file plaintiff's motion for judgment on the pleadings which is currently due on January 9, 2023. This is plaintiff's second request for an extension of time.

The additional time is necessary because our office has several closely scheduled deadlines in social security matters and counsel believes that additional time is necessary to review the record and prepare the brief in this case.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **January 19, 2023**;

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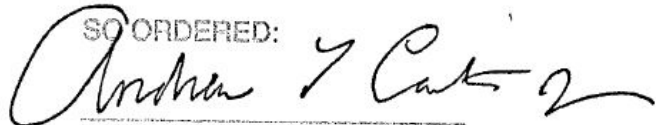
- b. Defendant to file its response to plaintiff's motion/cross motion on or before **March 20, 2023**; and
- c. Plaintiff to file her reply, if any, on or before **April 10, 2023**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Sixtina Fernandez, Esq. (by ECF)

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

Jan. 9, 2023